

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION**

**JOHN H. TAYLOR,
TDCJ No. 2402477,**

Plaintiff,

v.

BRIAN COLLIER, et al.,

Defendants.

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Civil Action No. 7:24-cv-042-O

DISTRICT COURT'S QUESTIONNAIRE TO PLAINTIFF

The issuance of this Questionnaire is intended to provide Plaintiff with an opportunity to supplement his complaint by providing more specific facts to support his claims and thereby allege his best case. *See Brown v. Taylor*, 829 F.3d 365, 370 (5th Cir. 2016).

Plaintiff shall answer the attached questions in the space provided following each question. If necessary, Plaintiff may attach additional 8½" x 11" sheets of paper to fully answer the questions. Do not write on the back of the pages. Do not staple, tape, glue or otherwise bind your answers to the Court's questions. Plaintiff shall sign the verification certificate under penalty of perjury and return the answers to questions to the Clerk of this Court by **April 22, 2024**. Failure to file answers to the Court's questions may result in dismissal of the case without further notice.

SO ORDERED this **1st day of April, 2024**.



Reed O'Connor
UNITED STATES DISTRICT JUDGE

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**JOHN H. TAYLOR,
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PLAINTIFF'S ANSWERS TO THE COURT'S QUESTIONNAIRE

QUESTION NO. 1: State all facts known to you that you rely on to establish that **TDCJ Executive Director Brian Collier** violated your civil rights. Be specific in describing all statements, acts, or omissions on the part of this Defendant which you claim demonstrate a violation of your civil rights with regard to the events described in your complaint.

ANSWER:

QUESTION NO. 2: State all facts known to you that you rely on to establish that **Warden Kevin Smith** violated your civil rights. Be specific in describing all statements, acts, or omissions on the part of this Defendant which you claim demonstrate a violation of your civil rights with regard to the events described in your complaint.

ANSWER:

QUESTION NO. 3: Did Officer Kareem Hayek order you and inmate Jones to stop fighting during the fight in which you were stabbed?

ANSWER:

QUESTION NO. 4: Did any correctional officer(s) other than Officer Hayek order you and inmate Jones to stop fighting?

ANSWER:

If your answer is “Yes,” identify each such officer.

ANSWER:

QUESTION NO. 5: Did any correctional officer(s) other than Hayek appear on the scene during or after your fight with inmate Jones?

ANSWER:

If your answer is “Yes,” identify each officer.

ANSWER:

QUESTION NO. 6: Approximately how far away from you was Officer Hayek when you were stabbed by inmate Jones?

ANSWER:

QUESTION NO. 7: Your complaint indicates that you were stabbed at 9:55 p.m. and a male nurse who came to see you at 10:00 p.m. refused to treat you. What reasons did the male nurse give to you for refusing treatment at that time? Be specific in stating what you were told by the male nurse.

ANSWER:

QUESTION No. 8: Is Officer Hayek the person who called for medical assistance?

ANSWER:

If your answer is “No,” identify the person who called for medical assistance or explain how the medical personnel otherwise knew that you needed medical attention.

ANSWER:

QUESTION NO. 9: When the female nurse attended to your stab wound at approximately 10:30 p.m., were you still in the sally port? If not, state the location where the female nurse provided medical treatment.

ANSWER:

If you were in a location other than the sally port when the female nurse saw you, did you walk there by yourself or were you escorted? If you were escorted, identify each person who escorted you.

ANSWER:

QUESTION NO. 10: What were you told by the female nurse about your stab wound?

ANSWER:

QUESTION NO. 11: State all facts known to you that you rely on to establish that Officer Kareem Hayek failed to protect you from being stabbed by inmate Jones. Be specific.

ANSWER:

QUESTION NO. 12: State all facts known to you that you rely on to establish that Officer Kareem Hayek denied or delayed your access to medical care. Be specific.

ANSWER:

QUESTION NO. 13: State all relief that you seek in this action. If you're asking for monetary damages, state the dollar amount you seek and describe how you calculated the dollar amount.

ANSWER:

VERIFICATION

STATE OF TEXAS

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COUNTY OF _____

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Civil No. 7:24-cv-042-O

I understand that a false statement or answer to any question in this cause of action will subject me to penalties for perjury. I hereby verify, (certify, declare or state), under penalty of perjury, that the foregoing answers are true and correct. (28 U.S.C. § 1746).

SIGNED on this _____ day of _____, 2024.

John H. Taylor, Plaintiff